

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

Christian PAUL ENZO Klein

Write the full name of each plaintiff.

CV

(Include case number if one has been assigned)

-against-

COMPLAINT

Metropolitan Transit Authority  
MTA Police Department. John Doe 1  
John Doe 2, John Doe 3, ~~John Doe 4~~  
Jane Doe 1, Jane Doe 2

Do you want a jury trial?

☒ Yes ☐ No

Write the full name of each defendant. If you need more space, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed above must be identical to those contained in Section II.

RECEIVED  
SDNY CIVIL DIVISION  
2021 AUG 23 PM 1:30

NOTICE

The public can access electronic court files. For privacy and security reasons, papers filed with the court should therefore *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number. See Federal Rule of Civil Procedure 5.2.

**I. BASIS FOR JURISDICTION**

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation, and the amount in controversy is more than \$75,000, is a diversity case. In a diversity case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal-court jurisdiction in your case?

☒ **Federal Question**

☐ **Diversity of Citizenship**

**A. If you checked Federal Question**

Which of your federal constitutional or federal statutory rights have been violated?

Section 1983, Wrongful Arrest, 6th amendment, Fair trial, speedy trial!

**B. If you checked Diversity of Citizenship****1. Citizenship of the parties**

Of what State is each party a citizen?

The plaintiff, Christian Paul Enzokian, is a citizen of the State of  
(Plaintiff's name)

New York  
(State in which the person resides and intends to remain.)

or, if not lawfully admitted for permanent residence in the United States, a citizen or subject of the foreign state of

If more than one plaintiff is named in the complaint, attach additional pages providing information for each additional plaintiff.

If the defendant is an individual:

The defendant, MTA, MTAPD, is a citizen of the State of New York

(Defendant's name)

or, if not lawfully admitted for permanent residence in the United States, a citizen or subject of the foreign state of \_\_\_\_\_.

If the defendant is a corporation:

The defendant, MTAPD, MTA, et al, is incorporated under the laws of the State of New York and Connecticut

and has its principal place of business in the State of New York

or is incorporated under the laws of (foreign state) Connecticut

and has its principal place of business in New York.

If more than one defendant is named in the complaint, attach additional pages providing information for each additional defendant.

## II. PARTIES

### A. Plaintiff Information

Provide the following information for each plaintiff named in the complaint. Attach additional pages if needed.

Christian P Klein  
First Name Middle Initial Last Name

General Delivery, NY  
Street Address

NY NY 10001  
County, City State Zip Code

917 938 4556 CPKLEIN25@gmail.com  
Telephone Number Email Address (if available)

**B. Defendant Information**

To the best of your ability, provide addresses where each defendant may be served. If the correct information is not provided, it could delay or prevent service of the complaint on the defendant. Make sure that the defendants listed below are the same as those listed in the caption. Attach additional pages if needed.

Defendant 1:

Metropolitan Transit Authority  
 First Name Last Name

Current Job Title (or other identifying information)

Grand Central Terminal  
 Current Work Address (or other address where defendant may be served)

NY NY  
 County, City State Zip Code

Defendant 2:

MTA PD  
 First Name Last Name

Current Job Title (or other identifying information)

Grand Central Terminal  
 Current Work Address (or other address where defendant may be served)

NY NY  
 County, City State Zip Code

Defendant 3:

John Doe -1  
 First Name Last Name

Conductor for Metro North  
 Current Job Title (or other identifying information)

Grand Central Terminal  
 Current Work Address (or other address where defendant may be served)

NY NY  
 County, City State Zip Code

Defendant 4:

John Doe 2

First Name

Last Name

MTA PD

Current Job Title (or other identifying information)

Grand Central

Current Work Address (or other address where defendant may be served)

County, City

State

Zip Code

## III. STATEMENT OF CLAIM

Place(s) of occurrence:

Stanford train station

Date(s) of occurrence:

8-22-2019

## FACTS:

State here briefly the FACTS that support your case. Describe what happened, how you were harmed, and what each defendant personally did or failed to do that harmed you. Attach additional pages if needed.

On the morning of August 22, 2019, I was attacked and wrongfully arrested by the MTA Police. This arrest was a result of blatant discrimination and attempted petty larceny by an MTA North conductor. I was being over charged by the conductor, he called the police. Four MTA PD cops, One Captain, female, One male ~~train~~ lieutenant, One male officer, and 1 female officer. They jumped me, and wrongfully arrested me. also I was seen in an emergency room for my injuries. I was charged

Defendant 5 JOHN Doe 3  
MTA PD  
NY, NY, ~~to~~

Defendant 6 - Jane Doe 1  
MTA PD  
NY, NY

Defendant 7 - Jane Doe 2  
MTA PD  
NY, NY



with, Theft of service, resisting arrest, breach of peace. All charges were dismissed with prejudice in October 2019, in Stamford Superior Court, before the Honorable Judge Cunniff. Before the disposition of my case, the MTA on the scene, John Doe #2, was found guilty at a departmental trial, after an internal affairs investigation into the case.

#### INJURIES:

If you were injured as a result of these actions, describe your injuries and what medical treatment, if any, you required and received.

Concussion, Neck Strain, Shoulder Strains

#### IV. RELIEF

State briefly what money damages or other relief you want the court to order.

\$170,000 to cover the arrest, emotional distress, mental distress, loss of wages, discrimination.

**V. PLAINTIFF'S CERTIFICATION AND WARNINGS**

By signing below, I certify to the best of my knowledge, information, and belief that: (1) the complaint is not being presented for an improper purpose (such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation); (2) the claims are supported by existing law or by a nonfrivolous argument to change existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Federal Rule of Civil Procedure 11.

I agree to notify the Clerk's Office in writing of any changes to my mailing address. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Each Plaintiff must sign and date the complaint. Attach additional pages if necessary. If seeking to proceed without prepayment of fees, each plaintiff must also submit an IFP application.

8-23-21  
 Dated \_\_\_\_\_  
 Plaintiff's Signature \_\_\_\_\_  
 First Name Christian Middle Initial PAUL Last Name Enzo  
 Street Address General Delivery  
 County, City NY State NY Zip Code 10001  
 Telephone Number 917 938 4556 Email Address (if available) Cpklein25@gmail.com

I have read the Pro Se (Nonprisoner) Consent to Receive Documents Electronically:

☒ Yes ☐ No

If you do consent to receive documents electronically, submit the completed form with your complaint. If you do not consent, please do not attach the form.